

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

UMG RECORDINGS, INC., et al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No. 1:17-cv-00365-DAE-AWA
	)	
GRANDE COMMUNICATIONS	)	
NETWORKS LLC,	)	
	)	
Defendant.	)	

**DEFENDANT GRANDE COMMUNICATIONS NETWORKS LLC'S  
NOTICE OF OBJECTIONS TO PLAINTIFFS' AFFIRMATIVE DEPOSITION  
DESIGNATIONS AND EXHIBIT LIST**

Pursuant to Local Rule CV-16(f) and the Court's Order Setting Jury Selection/Trial and Related Deadlines (ECF No. 275), Defendant Grande Communications Networks, LLC ("Grande") submits the attached Objections to Plaintiffs' Affirmative Deposition Designations (ECF No. 302-6) and Objections to Plaintiffs' Exhibit List (ECF No. 302-4). Grande reserves the right to separately contend that Plaintiffs' proposed exhibits and deposition designations should not be admitted pursuant to its forthcoming motions in limine.

With respect to Plaintiffs' Affirmative Deposition Designations, Grande's Objections are attached as Exhibit 1 and defined as follows:

Code	Objection/Authority
F	Foundation/Lack of Personal Knowledge (Fed. R. Evid. 104, 602, 901)
C	Completeness/Context (Fed. R. Evid. 106)
O	Improper Opinion Testimony by Lay Witness (Fed. R. Evid. 701)
LC	Legal Conclusion (Fed. R. Evid. 403, 701-04)
R	Relevance (Fed. R. Evid. 402)
P	Unfairly Prejudicial/Confusing/Misleading (Fed. R. Evid. 403)
H	Hearsay (Fed. R. Evid. 802)
IF	Improper Form of Question

With respect to Plaintiffs' Exhibit List, Grande's Objections<sup>1</sup> are attached as Exhibit 2 and defined as follows:

Code	Objection/Authority
H	Hearsay (Fed. R. Evid. 802)
S	Improper Summary (Fed. R. Evid. 1006)
B	Best Evidence Rule (Fed. R. Evid. 1002)
F	Foundation (Fed. R. Evid. 901)
O	Improper or Untimely Expert Testimony (Fed. R. Evid. 702; Fed. R. Civ. P. 26(b)(2); Scheduling Order, ¶ 2 (ECF No. 66))
ID	Insufficient Identification (the description of the exhibit is insufficient to allow Grande to locate it without undue burden, and/or the exhibit appears not to have been timely or properly produced in discovery)

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<sup>1</sup> Grande offers these Objections without regard to Plaintiffs' descriptions of identified exhibits, which are in some instances argumentative or otherwise inconsistent with the document at the identified bates number(s).

Dated: January 30, 2020

By: /s/ Richard L Brophy

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on January 30, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(b)(1).

/s/ Richard Brophy

Richard L. Brophy